

1 D. EDWARD HAYS, #162507
ehays@marshackhays.com
2 AARON E. DE LEEST, #216832
adeleest@marshackhays.com
3 ALINA MAMLYUK, #284154
amamlyuk@marshackhays.com
4 MARSHACK HAYS WOOD LLP
870 Roosevelt
Irvine, California 92620
5 Telephone: (949) 333-7777
6 Facsimile: (949) 333-7778

7 Attorneys for Chapter 11 Trustee and
Liquidating Trustee, RICHARD A.
8 MARSHACK

9 UNITED STATES BANKRUPTCY COURT
10 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

11 In re

12 THE LITIGATION PRACTICE GROUP P.C.,
13

14 Debtor.
15
16
17

Case No: 8-23-bk-10571-SC

Chapter 11

REPLY IN SUPPORT OF CHAPTER 11
TRUSTEE’S OMNIBUS OBJECTION TO
PROOFS OF CLAIM FILED FOR
ALLEGED ADMINISTRATIVE CLAIMS
[DK NO. 1747]

Hearing:

Date: January 16, 2025

Time: 11:00 a.m.

Ctrm: 5C

Place: 411 W. Fourth Street
Santa Ana, CA 92701

20
21 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE,
22 THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

23 Richard A. Marshack, in his capacities as Chapter 11 Trustee of the Bankruptcy Estate
24 (“Estate”) of The Litigation Practice Group P.C. (“Debtor”) and liquidating trustee of the LPG
25 Liquidation Trust (collectively, “Trustee”), hereby files this reply (the “Reply”) to the Response
26 made by claimant Carlos Bacsal (the “Response”) to Trustee’s Omnibus Objection to Proofs of
27 Claim Filed for Alleged Administrative Claims (the “Objection”).
28

1 **1. Argument Summary**

2 Carlos Bacsal (“Mr. Bacsal”) filed a Proof of Claim (the “POC”) seeking an administrative
3 expense claim in the amount of \$22,877.40 under 11 U.S.C. § 503(b)(9) by marking the box on the
4 proof of claim seeking such treatment. However, Mr. Bacsal is not entitled to an administrative
5 expense claim under § 503(b)(9). The POC and the statements made by Mr. Bacsal in in his
6 Response all reflect that Mr. Bacsal appears to have been a customer of the Debtor who made
7 monthly payments to the Debtor for its services, not a vendor who qualifies for an administrative
8 expense claim under 11 U.S.C. §503(b)(9) requirements. Mr. Bacsal simply does not have a valid
9 administrative claim and instead his claim should be reclassified by the Court as a general unsecured
10 claim to be paid with other similarly situated claims.

11 **2. Facts Relevant to This Reply**

12 On February 6, 2024, Ms. Bacsal timely filed his POC numbered C 571-100717.1 (100717-
13 1) in the amount of \$22,877.40. Mr. Bacsal attached the following evidence to the POC: a copy of
14 his Legal Services Agreement with Debtor (“LSA”), his initialed agreement outlining a schedule of
15 payments, electronic payment authorization for Debtor to initiate funds transfers from his US Bank
16 checking account, and copies of bank statements showing the transfers made by Debtor.

17 In the POC, Mr. Bacsal marked “Yes” as an answer to Question 12, indicating that the
18 entirety of his \$22,877.40 claim is “for the value of goods received by the debtor within 20 days
19 before the commencement date of this case (11 U.S.C. §503(b)(9)).”

20 In the POC, Mr. Bacsal answered Question 8, as to the basis of the claim, as “services not
21 performed per legal agreement.”

22 On September 24, 2024, the Trustee filed the Objection [Docket No. 1747] to the POC,
23 arguing that, along with sixty-nine (69) other claims made by other claimants, the POC was
24 mistakenly designated as an administrative expense. The initial hearing on the Objection motion
25 was held on November 14, 2024. A true and correct copy of the POC was attached to the Objection
26 as **Exhibit 7**.

1 On November 14, 2024, Mr. Bacsal was one of seven (7) claimants identified in Court's
2 posted tentative ruling instructing the Trustee to effectuate additional service by no later than
3 November 30, 2024, with a proof of service to be filed no later than December 5, 2025.

4 On November 22, 2024, the Court continued the hearing on the POC to January 16, 2025 at
5 11:00 a.m. Dk. No. 1947.

6 On November 27, 2024, the Trustee filed a Notice of Continued Hearing on the Objection.
7 Dk. No. 1962.

8 On December 2, 2024, the Trustee filed Notice Proof of Service of Notice of Continued
9 Hearing on the Objection. Dk. No. 1966.

10 On December 17, 2024, Mr. Bacsal filed the Response in which Mr. Bacsal included a letter
11 and the same evidence as attached to the POC, excluding the detailed bank statements. The letter in
12 the Response confirmed that Mr. Bacsal was a former customer of the Debtor.

13 On December 19, 2024, Trustee's counsel Alina Mamlyuk ("Atty Mamlyuk") left a voicemail
14 for Mr. Bacsal inviting him to call back so that Atty Mamlyuk could further explain the Objection
15 and Trustee's position.

16 On December 20, 2024, Mr. Bacsal returned Atty Mamlyuk's call and Atty Mamlyuk
17 communicated the Trustee's position to Mr. Bacsal in advance of the hearing on the POC.

18 **3. Legal Argument**

19 Section 503(b)(9) of the Bankruptcy Code provides an administrative claim for "the value of
20 goods received by the debtor within 20 days *before* the date of the commencement of a case under
21 this title in which the goods have been sold to the debtor in the ordinary course of such debtor's
22 business." (Emphasis added). As stated in the Objection, Mr. Bacsal has not provided any evidence
23 that would prove that the POC is entitled to treatment as an administrative expense under 11 U.S.C.
24 §503(b)(9) in the POC. In his Response, Mr. Basal did not actually oppose the Objection and did not
25 address the administrative claim designation that he made in the POC. Instead, Mr. Bacsal steadily
26 maintained that he paid the Debtor \$22,877.40 for Debtor's services ("legally represent [him] to
27 settle [his] debts in two years") which puts Mr. Bacsal in the same "bucket" of claimants as
28 thousands of others who were former customers of Debtor. Mr. Bacsal appears to have mistakenly

1 checked the box to Question 12 on the proof of claim form, which triggered the necessary response
2 from the Trustee. The Trustee made a formal objection to the Claim being given any administrative
3 priority because former clients of Debtor who timely filed their proofs of claim are not
4 administrative claimants and neither is Mr. Bacsal. Based on the evidence before the Court, the
5 Claim should be reclassified into a general unsecured claim.

6 **4. Conclusion**

7 The Trustee respectfully requests that the Court determine that the Claim is not validly
8 asserted as an administrative expense and that the Claim should be treated as a general unsecured
9 claim for purposes of payment.

10
11 DATED: January 9, 2025

MARSHACK HAYS WOOD LLP

12 By: /s/ D. Edward Hays
13 D. EDWARD HAYS
14 AARON E. DE LEEST
15 ALINA MAMLYUK
16 Attorneys for Chapter 11 Trustee and
17 Liquidating Trustee, RICHARD A.
18 MARSHACK
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DECLARATION OF ALINA MAMLYUK

I, ALINA MAMLYUK, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.

2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration.

3. The facts set forth below are true of my personal knowledge.

4. I am an attorney at law duly admitted to practice before this Court and all courts of the State of California.

5. I am of counsel to the law firm of Marshack Hays Wood LLP, attorneys of record for Richard A. Marshack, in his capacity as Chapter 11 Trustee ("Trustee") of the Litigation Practice Group P.C. ("LPG" or the "Debtor") in the above-captioned bankruptcy case (the "Bankruptcy Case").

6. I reviewed the docket in this case prior to execution of this Declaration to refresh my memory as to the dates on which particular documents were filed.

7. I make this Declaration in support of Reply in Support of Chapter 11 Trustee's Omnibus Objection to Proof of Claim Filed for Alleged Administrative Claims [Dk. No. 1747].

8. On December 19, 2024, I left a voicemail for Mr. Bacsal, inviting him to call me back so that I could further explain the Objection and Trustee's position regarding claims that were wrongfully designated as administrative expense claims when they appeared to be filed by former customers of LPG.

9. On December 20, 2024, I spoke with Mr. Bacsal and communicated the Trustee's position in advance of the hearing on the POC.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 9, 2025.


ALINA MAMLYUK

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **REPLY IN SUPPORT OF CHAPTER 11 TRUSTEE'S OMNIBUS OBJECTION TO PROOFS OF CLAIM FILED FOR ALLEGED ADMINISTRATIVE CLAIMS [DK NO. 1747]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **January 9, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR – MAIL REDIRECTED TO TRUSTEE

THE LITIGATION PRACTICE GROUP P.C.
17542 17TH ST
SUITE 100
TUSTIN, CA 92780-1984

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **January 9, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA PERSONAL DELIVERY:

PRESIDING JUDGE'S COPY

HONORABLE SCOTT C. CLARKSON
UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
411 WEST FOURTH STREET, SUITE 5130 / COURTROOM 5C
SANTA ANA, CA 92701-4593

CREDITOR- VIA OVERNIGHT MAIL

POC ADDRESS

CARLOS BACSAL
41961 MARGARITA RD., APT. 13
TEMECULA, CA 92591

VIA OVERNIGHT MAIL:

RESPONSE ADDRESS

CARLOS BACSAL
41969 MARGARITA RD, APT. 29
TEMECULA, CA 92591

CREDITOR – VIA OVERNIGHT MAIL

POC ADDRESS

CARLOS BACSAL
1655 SIERRA VERDE RD
CHULA VISTA, CA 91913

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 9, 2025
Date

Layla Buchanan
Printed Name

/s/ Layla Buchanan
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** CONTINUED:

- **INTERESTED PARTY COURTESY NEF:** Kyra E Andrassy kandrassy@raineslaw.com, bclark@raineslaw.com;jfisher@raineslaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Bradford Barnhardt** bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com,alinares@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR AFFIRMA, LLC and CREDITOR OXFORD KNOX, LLC: Eric Bensamochan** eric@eblawfirm.us, G63723@notify.cincompass.com
- **ATTORNEY FOR DEFENDANT LEUCADIA ENTERPRISES, INC.: Michael Jay Berger** michael.berger@bankruptcypower.com, yathida.nipha@bankruptcypower.com;michael.berger@ecf.inforuptcy.com
- **INTERESTED PARTY COURTESY NEF: Ethan J Birnberg** birnberg@portersimon.com, reich@portersimon.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Peter W Bowie** peter.bowie@dinsmore.com, caron.burke@dinsmore.com
- **ATTORNEY FOR CREDITOR SDCO TUSTIN EXECUTIVE CENTER, INC: Ronald K Brown** ron@rkbrownlaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Christopher Celentino** christopher.celentino@dinsmore.com, caron.burke@dinsmore.com
- **INTERESTED PARTY COURTESY NEF: Shawn M Christianson** cmcintire@buchalter.com, schristianson@buchalter.com
- **INTERESTED PARTY COURTESY NEF: Randall Baldwin Clark** rbc@randallbclark.com
- **ATTORNEY FOR DEFENDANT LISA COHEN and DEFENDANT ROSA BIANCA LOLI: Leslie A Cohen** leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;clare@lesliecohenlaw.com
- **ATTORNEY FOR DEFENDANT MORNING LAW GROUP, P.C.: Michael W Davis** mdavis@dtolaw.com, ygodson@dtolaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Aaron E. De Leest** adeleest@marshackhays.com, adeleest@marshackhays.com,alinares@ecf.courtdrive.com
- **INTERESTED PARTY COURTESY NEF: Anthony Paul Diehl** anthony@apdlaw.net, Diehl.AnthonyB112492@notify.bestcase.com,ecf@apdlaw.net
- **INTERESTED PARTY COURTESY NEF: Ashley Dionisio** adionisio@omniagnt.com
- **ATTORNEY FOR INTERESTED PARTY NATIONAL ASSOCIATION OF CONSUMER BANKRUPTCY ATTORNEYS and INTERESTED PARTY NATIONAL CONSUMER BANKRUPTCY RIGHTS CENTER : Jenny L Doling** jd@jdl.law, dolingjr92080@notify.bestcase.com;15994@notices.nextchapterbk.com;jdoling@jubilee bk.net
- **ATTORNEY FOR CREDITOR CAROLYN BEECH: Daniel A Edelman** dedelman@edcombs.com, courtecl@edcombs.com
- **INTERESTED PARTY COURTESY NEF: Howard M Ehrenberg** Howard.Ehrenberg@gmlaw.com, hehrenberg@ecf.courtdrive.com;hehrenberg@ecf.inforuptcy.com;Karen.Files@gmlaw.com;denise.walker@gmlaw.com
- **CREDITOR: Meredith Fahn** fahn@sbcglobal.net
- **INTERESTED PARTY COURTESY NEF: Jeremy Faith** Jeremy@MarguliesFaithlaw.com, Angela@MarguliesFaithlaw.com;Vicky@MarguliesFaithlaw.com
- **ATTORNEY FOR CREDITOR VALIDATION PARTNERS LLC: William P Fennell** william.fennell@fennelllaw.com, luralene.schultz@fennelllaw.com;wpf@ecf.courtdrive.com;hala.hammi@fennelllaw.com;naomi.cwalinski@fennellaw.com;samantha.larimer@fennelllaw.com;office@fennelllaw.com;Brendan.Bargmann@fennelllaw.com
- **INTERESTED PARTY COURTESY NEF: Alan W Forsley** alan.forsley@flpllp.com, awf@fklawfirm.com,awf@fl-lawyers.net,addy@flpllp.com
- **ATTORNEY FOR DEFENDANT CLEAR VISION LLC dba LIBERTY1 FINANCIAL: Marc C Forsythe** mforsythe@goeforlaw.com, mforsythe@goeforlaw.com;dcyrankowski@goeforlaw.com;Forsythe.MarcR136526@notify.bestcase.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Jeremy Freedman** jeremy.freedman@dinsmore.com, nicollette.murphy@dinsmore.com

- **ATTORNEY FOR CREDITOR HERRET CREDIT: Eric Gassman** erg@gassmanlawgroup.com, gassman.ericb112993@notify.bestcase.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Christopher Ghio** christopher.ghio@dinsmore.com, nicollette.murphy@dinsmore.com; angelica.urena@dinsmore.com; deamira.romo@dinsmore.com
- **ATTORNEY FOR CREDITOR AMY GINSBURG; CREDITOR KENTON COBB; and CREDITOR SHANNON BELLFIELD: Amy Lynn Ginsburg** efilings@ginsburglawgroup.com
- **ATTORNEY FOR DEFENDANT STRIPE, INC: Eric D Goldberg** eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- **ATTORNEY FOR CREDITOR AFFIRMA, LLC; CREDITOR ANAHEIM ARENA MANAGEMENT, LLC; CREDITOR ANAHEIM DUCKS HOCKEY CLUB, LLC; and CREDITOR OXFORD KNOX, LLC: Jeffrey I Golden** jgolden@go2.law, kadele@ecf.courtdrive.com; cbmeeker@gmail.com; lbracken@wgllp.com; dfitzgerald@go2.law; golden.jeffreyi.b117954@notify.bestcase.com
- **ATTORNEY FOR CREDITOR DEBT VALIDATION FUND II, LLC; CREDITOR MC DVI FUND 1, LLC; and CREDITOR MC DVI FUND 2, LLC: Richard H Golubow** rgolubow@wghlawyers.com, jmartinez@wghlawyers.com; svillegas@wghlawyers.com
- **ATTORNEY FOR CREDITOR UNITED PARTNERSHIPS, LLC: David M Goodrich** dgoodrich@go2.law, kadele@go2.law; dfitzgerald@go2.law; wgllp@ecf.courtdrive.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Spencer Keith Gray** spencer.gray@dinsmore.com
- **INTERESTED PARTY COURTESY NEF: Stella A Havkin** stella@havkinandshrago.com, shavkinesq@gmail.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): D Edward Hays** ehays@marshackhays.com, ehays@ecf.courtdrive.com; alinares@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR CITY CAPITAL NY: Alan Craig Hochheiser** ahochheiser@mauricewutscher.com, arodriguez@mauricewutscher.com
- **ATTORNEY FOR CREDITOR DEBT VALIDATION FUND II, LLC; CREDITOR MC DVI FUND 1, LLC; and CREDITOR MC DVI FUND 2, LLC: Garrick A Hollander** ghollander@wghlawyers.com, jmartinez@wghlawyers.com; svillegas@wghlawyers.com
- **ATTORNEY FOR CREDITOR SHARP ELECTRONICS CORPORATION: Brian L Holman** b.holman@musicpeeler.com
- **INTERESTED PARTY COURTESY NEF: Richard L. Hyde** rhyde@awglaw.com
- **ATTORNEY FOR INTERESTED PARTY MERCHANTS CREDIT CORPORATION: Peter L Isola** pisola@hinshawlaw.com, rmojica@hinshawlaw.com, iking@hinshawlaw.com
- **ATTORNEY FOR CREDITOR, PLAINTIFF, and COUNTER-DEFENDANT OHP-CDR, LP and PLAINTIFF and COUNTER-DEFENDANT PURCHASECO 80, LLC: Razmig Izakelian** razmigizakelian@quinnemanuel.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Veneeta Jaswal** veneeta.jaswal@dinsmore.com, bonnie.connolly@dinsmore.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Sara Johnston** sara.johnston@dinsmore.com
- **ATTORNEY FOR FIDELITY NATIONAL INFORMATION SERVICES, INC. DBA FIS: Sweeney Kelly** kelly@ksgklaw.com
- **ATTORNEY FOR DEBTOR THE LITIGATION PRACTICE GROUP P.C.: Joon M Khang** joon@khanglaw.com
- **ATTORNEY FOR INTERESTED PARTY AD HOC CONSUMER CLAIMANTS COMMITTEE: Ira David Kharasch** ikharasch@pszjlaw.com
- **ATTORNEY FOR DEFENDANT GALLANT LAW GROUP: Meredith King** mking@fsl.law, ssanchez@fsl.law; jwilson@fsl.law
- **ATTORNEY FOR COMMITTEE OF UNSECURED CREDITORS: Nicholas A Koffroth** nkoffroth@foxrothschild.com, khoang@foxrothschild.com
- **ATTORNEY FOR DEFENDANT MARICH BEIN, LLC: David S Kupetz** David.Kupetz@lockelord.com, mylene.ruiz@lockelord.com

- **INTERESTED PARTY COURTESY NEF: Christopher J Langley** chris@slclawoffice.com, langleycr75251@notify.bestcase.com;ecf123@casedriver.com;john@slclawoffice.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Kelli Ann Lee** Kelli.lee@dinsmore.com, kristy.allen@dinsmore.com
- **ATTORNEY DEFENDANT OPTIMUMBANK HOLDINGS, INC: Matthew A Lesnick** matt@lesnickprince.com, matt@ecf.inforuptcy.com;jmack@lesnickprince.com
- **ATTORNEY FOR DEFENDANT CONSUMER LEGAL GROUP, P.C.; DEFENDANT LGS HOLDCO, LLC; INTERESTED PARTY CONSUMER LEGAL GROUP, P.C.; and INTERESTED PARTY LIBERTY ACQUISITIONS GROUP INC: Daniel A Lev** daniel.lev@gmlaw.com, cheryl.caldwell@gmlaw.com;dlev@ecf.courtdrive.com
- **ATTORNEY FOR INTERESTED PARTY REVOLV3, INC.: Britteny Leyva** bleyva@mayerbrown.com, 2396393420@filings.docketbird.com;KAWWhite@mayerbrown.com;ladoocket@mayerbrown.com
- **INTERESTED PARTY COURTESY NEF ADVERSARY PROCEEDING #: 8:23-AP-01148-SC: Marc A Lieberman** marc.lieberman@flpllp.com, safa.saleem@flpllp.com,addy@flpllp.com
- **ATTORNEY FOR CREDITOR PHILLIP A GREENBLATT, PLLC: Michael D Lieberman** mlieberman@lipsonneilson.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Yosina M Lissebeck** Yosina.Lissebeck@Dinsmore.com, caron.burke@dinsmore.com;Wendy.Yones@Dinsmore.com
- **ATTORNEY FOR CREDITOR FUNDURA CAPITAL GROUP: Mitchell B Ludwig** mbl@kpclegal.com, kad@kpclegal.com
- **INTERESTED PARTY AND ATTORNEY: Daniel S March** marchlawoffice@gmail.com, marchdr94019@notify.bestcase.com
- **ATTORNEY FOR CREDITOR and DEFENDANT GREYSON LAW CENTER PC, CREDITOR and DEFENDANT HAN TRINH; and CREDITOR and DEFENDANT PHUONG (JAYDE) TRINH: Kathleen P March** kmarch@bkylawfirm.com, kmarch3@sbcglobal.net,kmarch@sbcglobal.net
- **ATTORNEY FOR CREDITOR DAVID ORR: Mark J Markus** bklawr@bklaw.com, markjmarkus@gmail.com;markus.markj.r112926@notify.bestcase.com
- **CHAPTER 11 TRUSTEE: Richard A Marshack (TR)** pkraus@marshackhays.com, ecf.alert+Marshack@titledxi.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Laila Masud** lmasud@marshackhays.com, lmasud@ecf.courtdrive.com;lbuchanan@marshackhays.com;alinares@ecf.courtdrive.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Sarah S. Mattingly** sarah.mattingly@dinsmore.com
- **INTERESTED PARTY COURTESY NEF: William McCormick** Bill.McCormick@ag.tn.gov
- **ATTORNEY FOR US TRUSTEE: Kenneth Miskin** Kenneth.M.Miskin@usdoj.gov
- **INTERESTED PARTY COURTESY NEF: Byron Z Moldo** bmoldo@ecjlaw.com, aantonio@ecjlaw.com,dperez@ecjlaw.com
- **ATTORNEY FOR CREDITOR ADP, INC: Glenn D. Moses** gmoses@venable.com, cascavone@venable.com;ipmalcolm@venable.com;jadelgado@venable.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Jamie D Mottola** Jamie.Mottola@dinsmore.com, jhanawalt@ecf.inforuptcy.com
- **INTERESTED PARTY COURTESY NEF: Alan I Nahmias** anahmias@mbn.law, jdale@mbn.law
- **INTERESTED PARTY COURTESY NEF: Victoria Newmark** vnewmark@pszjlaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Jacob Newsum-Bothamley** jacob.bothamley@dinsmore.com, angelica.urena@dinsmore.com;deamira.romo@dinsmore.com
- **ATTORNEY FOR US TRUSTEE: Queenie K Ng** queenie.k.ng@usdoj.gov
- **CREDITOR: Israel Orozco** israel@iolawcorp.com
- **ATTORNEY FOR COMMITTEE OF UNSECURED CREDITORS: Keith C Owens** kowens@foxrothschild.com, khoang@foxrothschild.com
- **ATTORNEY FOR DEFENDANT OPTIMUMBANK HOLDINGS, INC.: Lisa Patel** lpatel@lesnickprince.com, jmack@lesnickprince.com;jnavarro@lesnickprince.com
- **ATTORNEY FOR CREDITOR WELLS MARBLE AND HURST, PLLC: Michael R Pinkston** rpinkston@seyfarth.com,

jmcdermott@seyfarth.com,sfocalendar@seyfarth.com,5314522420@filings.docketbird.com,bankruptcydocket@seyfarth.com

- **ATTORNEY FOR DEFENDANT SCOTT JAMES EADIE: Douglas A Plazak** dplazak@rhlaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Tyler Powell** tyler.powell@dinsmore.com, jennifer.pitcock@dinsmore.com;rosetta.mitchell@dinsmore.com
- **ATTORNEY FOR DEFENDANT TOUZI CAPITAL, LLC and DEFENDANT ENG TAING: Daniel H Reiss** dhr@lnbyg.com, dhr@ecf.inforuptcy.com
- **ATTORNEY FOR DEFENDANT CONSUMER LEGAL GROUP, PC: Ronald N Richards** ron@ronaldrichards.com, 7206828420@filings.docketbird.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Vanessa Rodriguez** vanessa.rodriguez@dinsmore.com, angelica.urena@dinsmore.com
- **ATTORNEY FOR CREDITOR WELLS MARBLE AND HURST, PLLC: Kevin Alan Rogers** krogers@wellsmar.com
- **ATTORNEY FOR CREDITOR MARI AGAPE: Gregory M Salvato** gsalvato@salvatoboufadel.com, calendar@salvatolawoffices.com;jboufadel@salvatoboufadel.com;gsalvato@ecf.inforuptcy.com
- **ATTORNEY FOR CREDITOR AZZURE CAPITAL LLC and CREDITOR HI BAR CAPITAL LLC: Olivia Scott** olivia.scott3@bclplaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Jonathan Serrano** jonathan.serrano@dinsmore.com
- **ATTORNEY FOR RANDALL BALDWIN CLARK ATTORNEY AT LAW PLLC: Maureen J Shanahan** Mstotaro@aol.com
- **ATTORNEY FOR CREDITORS UNITED PARTNERSHIPS, LLC and MNS FUNDING LLC: Paul R Shankman** PShankman@fortislaw.com, info@fortislaw.com
- **ATTORNEY FOR INTERESTED PARTY MORNING LAW GROUP, PC: Zev Shechtman** Zev.Shechtman@saul.com, zshechtman@ecf.inforuptcy.com;easter.santamaria@saul.com
- **INTERESTED PARTY COURTESY NEF: Jeffrey M Singletary** jsingletary@swlaw.com, rmckay@swlaw.com
- **ATTORNEY FOR CREDITOR PIONEER FUNDING GROUP, LLC: Adam D Stein-Sapir** info@pfllc.com
- **ATTORNEY FOR DEFENDANT BANKUNITED, N.A.: Howard Steinberg** steinbergh@gtlaw.com, pearsallt@gtlaw.com;NEF-BK@gtlaw.com;howard-steinberg-6096@ecf.pacerpro.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): John H. Stephens** john.stephens@dinsmore.com, lizbeth.alonso@dinsmore.com
- **ATTORNEY FOR CREDITOR ALTERYX, INC.: Andrew Still** astill@swlaw.com, kcollins@swlaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Matthew J Stockl** matthew.stockl@dinsmore.com, katrice.ortiz@dinsmore.com
- **ATTORNEY FOR CREDITOR RANDALL BALDWIN CLARK ATTORNEY AT LAW PLLC and INTERESTED PARTY RANDALL BALDWIN CLARK: Michael R Totaro** Ocbkatty@aol.com
- **US TRUSTEE: United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov
- **ATTORNEY FOR WITNESS BRADFORD LEE 8:23-ap-01046-SC: William J Wall** wwall@wall-law.com
- **ATTORNEY FOR CREDITOR and DEFENDANT AZZURE CAPITAL LLC and CREDITOR HI BAR CAPITAL LLC: Sharon Z. Weiss** sharon.weiss@bclplaw.com, raul.morales@bclplaw.com,REC_KM_ECF_SMO@bclplaw.com
- **ATTORNEY FOR CREDITOR DEBT RELIEF GROUP, LLC: Johnny White** JWhite@wrslawyers.com, jlee@wrslawyers.com
- **CLAIM AGENT FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Reina Zepeda** rzepeda@omniagnt.com